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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,
Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

)
) Case No.: Case No. CV-07-02669 (CRB)
)
)

) **NOTICE OF PLAINTIFF'S**
) **MOTION TO COMPEL RESPONSES TO**
) **1ST SET OF DISCOVERY REQUESTS ON**
) **DEFENDANT INGRASSIA**

) Date: August 22, 2008
) Time: 10:00 a.m.
) Honorable Charles R. Breyer
)
)

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 22, 2008, at 10:00 a.m., in the Courtroom of
the Honorable Charles R. Breyer, Federal District Judge of the Northern District of California,
Courtroom 8, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, Plaintiff Abhinav
Bhatnagar will move the Court for an order requiring Defendant Ingrassia to (1) answer specified

1 interrogatories in Plaintiff's 1st Set of Interrogatories on Defendant Ingrassia, and (2) produce
2 documents responsive to specified document requests in Plaintiff's 1st Set of Document Requests
3 on Defendant Ingrassia. This motion is made pursuant to Fed.R.Civ.Pro. 26(b)(1) and Civil
4 Local Rules 7 and 37 on the grounds that the discovery at issue is relevant, may lead to the
5 discovery of admissible evidence, is unprivileged, and Defendant Ingrassia has failed to permit
6 lawful discovery.

7 This motion is based upon the accompanying memorandum of points of authorities, the
8 declaration of Plaintiff's counsel, Jenny Huang, and all exhibits attached thereto. Pursuant to
9 Civil Local Rule 6-3, Plaintiff files a separate motion seeking leave to file this motion on an
10 expedited basis.

11
12
13 Dated: July 26, 2008
Oakland, California

14 **JUSTICE FIRST, LLP**

15 Attorneys for Plaintiff Abhinav Bhatnagar

16 By:

17 /s/ Jenny Huang

18 Jenny C. Huang

19 2831 Telegraph Avenue

20 Oakland, CA 94609

21 Tel.: (510) 628-0695

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,)
Plaintiff,) Case No.: Case No. CV07-02669 (CRB)
vs.)
JASON INGRASSIA, individually and in)
his official capacity; COUNTY OF) **PROOF OF SERVICE**
CONTRA COSTA; and CITY OF)
SAN RAMON.)
Defendants.)

I, Jenny Huang, hereby declare as follows:

1. I am a citizen of the United States of America over the age of eighteen years. My business address is 2831 Telegraph Avenue, Oakland, California, 94609. I am not a party to this action.

2. On July 26, 2008, I served by electronically filing a true and correct copy of the **Notice of Plaintiff's Motion to Compel Responses to Plaintiff's 1st Set of Discovery Requests on Defendant Ingrassia, Plaintiff's Memorandum of Points and Authorities in Support of Plaintiff's Motion to Compel, the Declaration of Jenny Huang with attached exhibits, and Plaintiff's Proposed Order** to the following parties:

Mr. Gregory Harvey
Counsel for Municipal Defendants
Asst. County Counsel
Contra Costa County
651 Pine Street, 9th Floor
Martinez, CA 94553

Mr. James Fitzgerald, III
Counsel for Defendant Ingrassia
McNamara Dodge et al. LLP
P O Box 5288
Walnut Creek, CA 94596-1288

I declare under penalty of perjury the foregoing is true and correct.

Date: July 26, 2008
Oakland, California

/s/ Jenny Huang
JENNY C. HUANG